

Exhibit B

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7 Attorneys for Defendant

8 UNIVERSITY OF SOUTHERN CALIFORNIA

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 DOE JEWISH USC FACULTY
12 MEMBER 2004 and DOE JEWISH
13 USC STUDENT 1987, Individually
And On Behalf of All Others Similarly
Situated,

14 Plaintiffs,

15 v.

16 Trustees of THE UNIVERSITY OF
17 SOUTHERN CALIFORNIA, a private
18 public benefit corporation; and DOES 1
through 100, inclusive,

19 Defendants.

Case No.

**DECLARATION OF FRANK
CHANG IN SUPPORT OF
DEFENDANT'S NOTICE OF
REMOVAL OF ACTION
PURSUANT TO 28 U.S.C. §§ 1332,
1441, 1446, AND 1453**

20
21 I, Frank Chang, declare:

22 1. I am over 18 years of age. I submit this declaration in support of
23 Defendant University of Southern California's ("USC" or "the University") Notice of
24 Removal of Action Pursuant to 28 U.S.C. §§ 1332, 1441, 1446, and 1453. The facts
25 below are based on my personal knowledge and my familiarity with, and access to,
26 records maintained by USC in the regular course of its operations. If called as a
27 witness, I could and would testify competently to them.

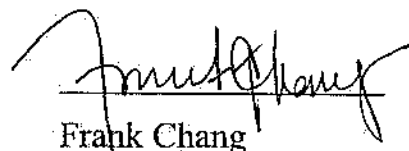
1 2. I am the University Registrar at USC, and have held that role since 2015.
2 I oversee USC's Academic Records and Registrar department (the "Registrar"). The
3 Registrar is responsible for maintaining the records of USC's student body. Among
4 other functions, the Registrar is responsible for collecting and maintaining USC's
5 official demographic information about its students. In connection with my role at
6 USC, I have access to USC's records that are discussed in this declaration.

7 3. USC does not require its students to disclose their religious affiliation to
8 the University. The vast majority of the over 47,000 students enrolled at USC for the
9 Spring 2024 semester ("Spring 2024 Students") have not reported their religious
10 affiliation to the Registrar.

11 4. That said, a small subset of the Spring 2024 Students—amounting to
12 approximately four percent of students—have self-reported their religious affiliation
13 on an optional basis. Of those students, over 100 individual Spring 2024 Students
14 have self-reported their religious affiliation as Jewish, including more than one who
15 are from states outside of California (including at least one from New York), and at
16 least one is a citizen of a country outside of the United States (including one from
17 Guatemala).

18 5. Beyond this self-selected subset of self-reported religious affiliation
19 data, USC has no other systematic data concerning religious affiliation of the Spring
20 2024 Students.

21 I declare, under penalty of perjury, under the laws of the United States of
22 America that the foregoing is true and correct. Executed this 2nd day of July 2024, in
23 Los Angeles, California.

24 
25 Frank Chang
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